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July 15, 2021

Hon. Laura Taylor Swain
Chief United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *United States of America v. Constantinescu, et al.*
Indictment No.: 19-CR-651

Dear Judge Swain:

I am counsel to Defendant Florian Martin. Mr. Martin is currently scheduled for a remote status conference before Your Honor on July 28, 2021. I write to respectfully request at least a one-month adjournment to any date convenient to the Court, the government and counsel.

We continue to engage the government in plea negotiations and to review discovery. Mr. Martin, who remains in custody at the MCC New York, continues to review the contents of his discovery.

I have spoken with the government, by AUSA Samuel Rothschild, who consents to this request.

Mr. Martin consents to the exclusion of time from the speedy trial clock from today through the adjourned date. This will permit him the opportunity to continue to both review discovery and engage in plea discussions.

The Court's consideration is greatly appreciated.

Respectfully submitted,

Edward V. Sapone (ES-2553)
Counsel to Defendant
Florian Martin

Cc: AUSA Elizabeth Hanft, Esq.
AUSA Robert Sobelman, Esq.
AUSA Samuel Rothschild, Esq.

The foregoing request for an adjournment is granted. The next pretrial conference is hereby scheduled for September 8, 2021 at 11:00am. The Court finds pursuant to 18 USC section 3161(h)(7)(A) that the ends of justice served by an exclusion of the time from today's date through September 8, 2021, outweigh the best interests of the public and the defendant in a speedy trial for the reasons stated above. Dkt. entry no. 756 resolved.

SO ORDERED.

7/19/2021

/s/ Laura Taylor Swain, Chief USDJ